

Comments on Chapters 1-4 hebert

From: Hebert, Joey C. [Joey.HEBERT@GAPAC.com]

Sent: Wednesday, January 19, 2005 10:05 AM

To: Sharon Parker

Subject: Comments on Chapters 1-4

\* Page 11, Definition of Industrial waste. Devise language that allows waste characterization (testing or visual examination) to classify waste as non industrial solid waste that can be disposed in a Sanitary Landfill instead of industrial waste landfill. An example is insulation from a process area that has been washed of all process related residuals, where a visually clean standard could apply. Another is cooling tower debris where it is non hazardous (hexavalent chrome is the potential problem) and it has been cleaned of industrial waste based on testing (wipe testing or rinse testing or material testing). The objective would be to dispose some materials in Sanitary Landfills that are currently being landfilled in industrial landfills but which do not pose a risk to human health or the environment except for nuisance due to being discarded.

\* 302.A wastes not governed...page 21. Use the language from #1 to create a new paragraph for DOTD approved raw materials that were process residuals.

\* 303.A.12 Expand per committee recommendations to define the criteria for beneficial reuse.

\* 305.A.6. Add an example of industrial facilities that process solid waste by non destructive and non thermal means on site. Is this compost processing? This is an old reg that probably does not get taken advantage of because people don't know what it means.

\* 307.A.2 what happens after a year and the department hasn't taken action?

\* 315.B. Don't impose a blanket 30 day storage limit. It needs to be performance based.

\* 315.J. Revise to allow industrial waste NORM at or less than 30 pico curies for radium 226 or radium 228 per gram, to be disposed in a Type II Solid Waste Landfill. This would address a problem with LAC 33:XV Chapter 14 which allows NOW/NORM to be disposed but does not recognize industrial NORM.